

CONTAINS NO CBI



Form Approved
OMB No. 2010-0019
Approval Expires 12-31-89

EPA-OTS



000611696T

90-890000621

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Comprehensive Assessment Information Rule
REPORTING FORM

89 SEP -6 AM 9:14
EPA-OTS

When completed, send this form to:

Document Processing Center
Office of Toxic Substances, TS-790
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460
Attention: CAIR Reporting Office

For Agency Use Only:

Date of Receipt: _____

Document
Control Number: _____

Docket Number: _____

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been

CBI completed in response to the Federal Register Notice of..... [1][2] [2][2] [8][8]
mo. day year

☐ a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. [0][0][0][5][8][4]-[8][4]-[9]

b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.

(i) Chemical name as listed in the rule NA

(ii) Name of mixture as listed in the rule NA

(iii) Trade name as listed in the rule NA

c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.

Name of category as listed in the rule NA

CAS No. of chemical substance [][][][][][]-[][]-[]

Name of chemical substance NA

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

CBI Manufacturer 1

☐ Importer 2

Processor ③

X/P manufacturer reporting for customer who is a processor 4

X/P processor reporting for customer who is a processor 5

☐ Mark (X) this box if you attach a continuation sheet.

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI

☐ Yes ☒ Go to question 1.04

☐

No ☐ Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI

☐ Yes 1

☐

☒ No 2

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s)

☐ You have chosen to report for your customers

☐ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI

☐ Trade name Conathane EN-1554 Part A

☐

Is the trade name product a mixture? Circle the appropriate response.

☒ Yes 1

No 2

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI

☐ "I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

Thomas X. Tsirimokos
NAME

Thomas X. Tsirimokos
SIGNATURE

8/31/89
DATE SIGNED

Senior Staff Attorney
TITLE

(603) 885-4556
TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

- 1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission.

CBI

☐

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

Not Applicable

NAME

SIGNATURE

DATE SIGNED

TITLE

()

TELEPHONE NO.

DATE OF PREVIOUS
SUBMISSION

- 1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI

☐

"My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position."

Not Applicable

NAME

SIGNATURE

DATE SIGNED

TITLE

()

TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

1.09 Facility Identification

1.10 Company Headquarters Identification

☐ Mark (X) this box if you attach a continuation sheet.

1.14 Facility Acquired -- If you purchased this facility during the reporting year, provide the following information about the seller: *1st 10-11-11*

Not Applicable

[illegible][illegible]

Street

City

[] [] [] [] [] [] [] -- [] [] [] []

State

Zip

Employer ID Number[][][][][][][][]

Date of Sale[][] [][] [][]

Mo.

Day

Year

[illegible]

Telephone Number[][]-[][]-[][]

1.15 Facility Sold -- If you sold this facility during the reporting year, provide the following information about the buyer: *Not Applicable*

Not Applicable

[illegible][illegible]

Street

[]

City

[] [] [] [] [] [] [] -- [] [] [] []

State

Zid

Employer ID Number[][][][][][][][]

Date of Purchase[][] [][] [][]

Mo.

Day

Year

[illegible]

Telephone Number[][]-[][]-[][][]

☐ Mark (X) this box if you attach a continuation sheet.

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

☐

Classification

Quantity (kg/yr)

Manufactured Not App.

Imported Not App.

Processed (include quantity repackaged) 104 Kg.

Of that quantity manufactured or imported, report that quantity:

In storage at the beginning of the reporting year Not App.

For on-site use or processing Not App.

For direct commercial distribution (including export) Not App.

In storage at the end of the reporting year Not App.

Of that quantity processed, report that quantity:

In storage at the beginning of the reporting year NA

Processed as a reactant (chemical producer) 0.0

Processed as a formulation component (mixture producer) 0.0

Processed as an article component (article producer) NA

Repackaged (including export) 0.0

In storage at the end of the reporting year NA

☐ Mark (X) this box if you attach a continuation sheet.

1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

[]

Average %
Composition by Weight
(specify precision,
e.g., 45% \pm 0.5%)

Component Name	Supplier Name	(specify precision, e.g., 45% ± 0.5%)
Toluene 2,4 Diisocyanate	Cenap, Inc.	< 8% ± NA
Total		100%

☐ Mark (X) this box if you attach a continuation sheet.

- 2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending 12 8
Mo. Year

Quantity manufactured Not App. kg

Quantity imported Not App. kg

Quantity processed 250 kg

Year ending 07 8
Mo. Year

Quantity manufactured Not App. kg

Quantity imported Not App. kg

Quantity processed 532 kg

Year ending 07 8
Mo. Year

Quantity manufactured Not App. kg

Quantity imported Not App. kg

Quantity processed 631 kg

- 2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI

☐ Continuous process Not Applicable 1

Semicontinuous process 2

Batch process 3

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types.

☐

Continuous process

Semicontinuous process

☒ Batch process

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.)

☐

Manufacturing capacity kg/yr

Processing capacity kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume.

☐

	Manufacturing Quantity (kg)	Importing Quantity (kg)	Processing Quantity (kg)
Amount of increase	<u>Not Applicable</u>	<u>Not Applicable</u>	<u>UK</u>
Amount of decrease	<u>Not Applicable</u>	<u>Not Applicable</u>	<u>UK</u>

☐ Mark (X) this box if you attach a continuation sheet.

2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

☐

Days/Year Average
Hours/Day

Process Type #1 (The process type involving the largest quantity of the listed substance.)

Manufactured Not Applicable

Processed 180 1.5

Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)

Not Applicable

Manufactured _____

Processed _____

Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)

Not Applicable

Manufactured _____

Processed _____

2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

☐

Maximum daily inventory Response not required for TDI kg

Average monthly inventory _____ kg

☐ Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI

☐

<u>CAS No.</u>	<u>Chemical Name</u>	<u>Byproduct, Coproduct or Impurity¹</u>	<u>Concentration (%) (specify ± % precision)</u>	<u>Source of By-products, Coproducts, or Impurities</u>
<u>UK</u>	<u>UK</u>	<u>UK</u>	<u>UK</u>	<u>UK</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

¹Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct
C = Coproduct
I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

- 2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to ☐ the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types ¹	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users ²
<u>L</u>	<u>100% Processed</u>	<u>0</u>	<u>I</u>

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

- 2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types ¹	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users ²
NA	NA	NA	NA

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.14 Final Product -- Complete the following table for each type of final product manufactured, imported, or processed at your facility that contains the listed substance other than as an impurity.

☐

a.	b.	c.	d.
Product Type ¹	Final Product's Physical Form ²	Average % Composition of Listed Substance in Final Product	Type of End-Users ³
<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the final product's physical form:

A = Gas	F2 = Crystalline solid
B = Liquid	F3 = Granules
C = Aqueous solution	F4 = Other solid
D = Paste	G = Gel
E = Slurry	H = Other (specify) _____
F1 = Powder	

³Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the
CBI listed substance to off-site customers.

☐ *Not Applicable*

Truck	1
Railcar	2
Barge, Vessel	3
Pipeline	4
Plane	5
Other (specify)	6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers
CBI or prepared by your customers during the reporting year for use under each category
of end use listed (i-iv).

☐ Category of End Use

i. Industrial Products

Chemical or mixture	<i>Not App.</i>	kg/yr
Article	" "	kg/yr

ii. Commercial Products

Chemical or mixture	<i>Not App.</i>	kg/yr
Article	" "	kg/yr

iii. Consumer Products

Chemical or mixture	<i>Not App.</i>	kg/yr
Article	" "	kg/yr

iv. Other

Distribution (excluding export)	<i>Not App.</i>	kg/yr
Export	" "	kg/yr
Quantity of substance consumed as reactant	" "	kg/yr
Unknown customer uses	" "	kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

PART A GENERAL DATA

- 3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.
CBI The average price is the market value of the product that was traded for the listed substance.

☐

Source of Supply

Quantity
(kg)

Average Price
(\$/kg)

The listed substance was manufactured on-site.

NA

NA

The listed substance was transferred from a different company site.

NA

NA

The listed substance was purchased directly from a manufacturer or importer.

104 kg

\$21.54

The listed substance was purchased from a distributor or repackager.

NA

NA

The listed substance was purchased from a mixture producer.

NA

NA

- 3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

☐

Truck

①

Railcar

2

Barge, Vessel

3

Pipeline

4

Plane

5

Other (specify) _____

6

☐ Mark (X) this box if you attach a continuation sheet.

3.03 a. Circle all applicable containers used to transport the listed substance to your facility.
CBI

☐

Bags 1
Boxes 2
Free standing tank cylinders 3
Tank rail cars 4
Hopper cars 5
Tank trucks 6
Hopper trucks 7
Drums 8
Pipeline 9
Other (specify) 10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders Not Applicable mmHg
Tank rail cars mmHg
Tank trucks mmHg

☐ Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

CBI

☐

<u>Trade Name</u>	<u>Supplier or Manufacturer</u>	<u>Average % Composition by Weight (specify \pm % precision)</u>	<u>Amount Processed (kg/yr)</u>
<u>Conathane EN-1554</u>	<u>Conap, Inc.</u>	<u><8% \pm NA</u>	<u>104 Kg.</u>
<u>(Part A)</u>			

☐ Mark (X) this box if you attach a continuation sheet.

PART C RAW MATERIAL VOLUME

3.05 State the quantity of the listed substance used as a raw material during the reporting year in the form of a class I chemical, class II chemical, or polymer, and the percent composition, by weight, of the listed substance.

☐

	Quantity Used (kg/yr)	% Composition by Weight of Listed Sub- stance in Raw Material (specify \pm % precision)
Class I chemical	<u>104 Kg.</u>	<u>8% \pm NA</u>
	<u> </u>	<u> </u>
	<u> </u>	<u> </u>
Class II chemical	<u>Not App.</u>	<u>Not App.</u>
	<u> </u>	<u> </u>
	<u> </u>	<u> </u>
Polymer	<u>Not App.</u>	<u>Not App.</u>
	<u> </u>	<u> </u>
	<u> </u>	<u> </u>

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

PART A PHYSICAL/CHEMICAL DATA SUMMARY

- 4.01 Specify the percent purity for the three major¹ technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the CBI substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

☐ "NA -- Mixture"

	<u>Manufacture</u>	<u>Import</u>	<u>Process</u>
Technical grade #1	_____ % purity	_____ % purity	_____ % purity
Technical grade #2	_____ % purity	_____ % purity	_____ % purity
Technical grade #3	_____ % purity	_____ % purity	_____ % purity

¹Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes ①

No 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company 1

Another source ②

☐ Mark (X) this box if you attach a continuation sheet.

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

Yes 1

☒ No ☒ 2

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the final state of the product.

CBI
[]

Activity	Physical State				
	Solid	Slurry	Liquid	Liquified Gas	Gas
Manufacture	1	2	3	4	5
Import	1	2	3	4	5
Process	1	<input checked="" type="radio"/> 2	<input checked="" type="radio"/> 3	4	5
Store	1	2	3	4	5
Dispose	1	2	3	4	5
Transport	1	2	3	4	5

☐ Mark (X) this box if you attach a continuation sheet.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles ≥ 10 microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI
☐

Not Applicable

<u>Physical State</u>		<u>Manufacture</u>	<u>Import</u>	<u>Process</u>	<u>Store</u>	<u>Dispose</u>	<u>Transport</u>
Dust	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____
Powder	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____
Fiber	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____
Aerosol	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 5 ENVIRONMENTAL FATE

PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis:

Absorption spectrum coefficient (peak) UK (1/M cm) at _____ nm
 Reaction quantum yield, ϕ UK at _____ nm
 Direct photolysis rate constant, k_p , at ... UK 1/hr _____ latitude

b. Oxidation constants at 25°C:

For 1O_2 (singlet oxygen), k_{ox} UK 1/M hr
 For RO_2 (peroxy radical), k_{ox} UK 1/M hr

c. Five-day biochemical oxygen demand, BOD_5 ... UK mg/l

d. Biotransformation rate constant:

For bacterial transformation in water, k_b ... UK 1/hr
 Specify culture UK

e. Hydrolysis rate constants:

For base-promoted process, k_b UK 1/M hr
 For acid-promoted process, k_a UK 1/M hr
 For neutral process, k_n UK 1/hr

f. Chemical reduction rate (specify conditions) UK

g. Other (such as spontaneous degradation) ... UK

☐ Mark (X) this box if you attach a continuation sheet.

Rec 8/14/89

Conthane EN1554 'A'

C O N A P I N C .
1405 Buffalo St.
Olean, New York 14760
716/372-9650

===== MATERIAL SAFETY DATA SHEET =====
Note: This form is to be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Blank spaces are not permitted.

===== I. IDENTIFICATION =====
Trade Name: Conthane EN-1554 Part A Date: 5/25/89
Chemical Name, common name: Complex Mixture; Polyurethane Prepolymer

===== II. HAZARDOUS INGREDIENTS =====
Chemical Names CAS No. % ACGIH(TLV) OSHA(PEL) Other

Toluene 2,4 Diisocyanate 584-84-9 <8% .005ppm TWA
.005ppm TWA .02ppm STEL ND

Material may present a dust hazard if cut, ground or machined after curing.

===== III. PHYSICAL DATA =====
Boiling Point ND !Specific Gravity (H2O=1) 1.06
Vapor Pressure, mm Hg ND !Vapor Density (air=1) ND
Melting Pt./Range ND !Evaporation rate (Ether=1) ND
Solubility in Water: REACTS! Physical State: LIQUID
Percent volatile by volume: Negligible
Appearance and Odor: Liquid; For TDI Sharp pungent (odor threshold greater than TLV)

===== IV. FIRE AND EXPLOSION DATA =====
Flash Point, F (Method): > 260 F PMCC
Flammable Limits ND LEL ND UEL ND
Extinguishing Materials:
-XX-Water Spray -XX-Dry Chemical -XX-Carbon Dioxide
-XX-Foam -ND-Other:
Special Firefighting Procedures/Unusual Fire or Explosion Hazards:

Full emergency equipment with self-contained breathing apparatus and full protective clothing should be worn by fire fighters. No skin surface should be exposed. During a fire TDI vapors and other irritating, highly toxic gases may be generated by thermal decomposition or combustion. At temperatures greater than 350 F TDI forms carbodiimides with the release of CO2 which can cause pressure build-up in closed containers. Explosive rupture is possible. Therefore, use cold water to cool fire-exposed containers.

===== V. HEALTH HAZARD INFORMATION =====
ACUTE TOXICITY (Routes of entry)

Inhalation:
LC50.(4 hr.): Range 16-50ppm for 1-4 hr (Rat) on TDI. TDI

vapors or mist at concentrations above the TLV can irritate (burning sensation) the mucous membranes in the respiratory tract (nose, throat, lungs) causing runny nose, sore throat, coughing, chest discomfort, shortness of breath and reduced lung function (breathing obstruction). Persons with a preexisting, nonspecific bronchial hyperactivity can respond to concentrations below the TLV with similar symptoms as well as asthma attack. Exposure well above the TLV may lead to bronchitis. bronchial spasm and pulmonary edema (fluid in the lungs). These effects are usually reversible. Chemical or hypersensitive pneumonitis, with flu-like symptoms (e.g. fever, chills), has also been reported. These symptoms can be delayed up to several hours after exposure.

Ingestion:

ORAL, LD50 > 5800 mg/kg (Rats). Can result in irritation and corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

Eye Contact:

Strongly irritating (Rabbits) OECD Guidelines. Liquid, aerosols or vapors are severely irritating and can cause pain, tearing, reddening and swelling. If left untreated, corneal damage can occur and injury is slow to heal. however, damage is usually reversible.

Skin Contact:

Skin sensitizer in guinea pigs. One study with guinea pigs reported that repeated skin contact with TDI caused respiratory sensitization. Isocyanates react with skin protein and moisture and can cause irritation which may include the following symptoms: reddening, swelling, rash, scaling or blistering. Cured material is difficult to remove.

Skin Absorption:

ND

CHRONIC TOXICITY

Carcinogenicity:

--X-Yes: --X---NTP --X----IARC ----Federal OSHA

In a DRAFT of a lifetime bioassay, the National Toxicology Program reported that TDI caused an increase in the number of tumors in exposed rats over those counted in non-exposed rats. The TDI was administered by gavage where TDI was introduced into the stomach through a tube. In lifetime inhalation studies conducted by Hazelton Labs for the International Isocyanate Institute, TDI did NOT demonstrate carcinogenic activity in rats or mice.

Target Organ Affected:

No specific information available.

Effects of Overexposure:

Inhalation:

Inhalation of TDI vapors at concentrations above allowable limits can produce irritation of the mucous membranes in the respiratory tract resulting in running nose, sore throat, productive cough and a reduction in lung function (breathing obstruction). As a result of previous repeated overexposures or a single large dose, certain individuals may develop isocyanate sensitization (chemical asthma) which will cause them to react to a later exposure to isocyanate at levels well below the TLV. Another type of response is hyperreactivity or hypersensitivity, in which persons, (as a result of a previous repeated overexposure or large single dose), can respond to small TDI concentrations at levels well below the .02ppm. Symptoms could be immediate or delayed and include chest tightness, wheezing, cough, shortness of breath or asthmatic attack. Hypersensitivity pneumonitis (with similar respiratory symptoms and fever which has been delayed) has also been reported. Similar to many non-specific asthmatic responses, there are reports that once sensitized an individual can experience these symptoms upon exposure to dust, cold air or other irritants. This increased lung sensitivity can persist for weeks and in severe cases for several years. Chronic overexposure to isocyanate has also been reported to cause lung damage (including decrease in lung function) which may be permanent. Sensitization can either be temporary or permanent.

Eyes:

Liquid, vapors or aerosols are severely irritating to the eyes and can cause tears. Prolonged vapor contact may cause conjunctivitis. Corneal injury can occur which can be slow to heal; however damage is usually reversible.

Skin:

TDI reacts with skin protein and tissue moisture and can cause localized irritation as well as discoloration. Prolonged contact could produce reddening, swelling, or blistering and, in some individuals, skin sensitization resulting in dermatitis. Once sensitized a individual can develop recurring symptoms as a result of exposure to vapor.

Ingestion:

Ingestion could result in irritation and some corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

Medical Conditions Aggravated By Exposure

Asthma, other respiratory disorders (bronchitis, emphysema, bronchial hyperreactivity), skin allergies, eczema.

FIRST AID: EMERGENCY PROCEDURES

Eye Contact:

Flush with clean, lukewarm water (low pressure) for at least 15 minutes, occasionally lifting eyelids, and obtain medical attention. Refer individual to an ophthalmologist for immediate follow-up.

Skin Contact:

Remove contaminated clothing. Wash effected areas thoroughly with soap or tincture of green soap and water. Wash contaminated clothing thoroughly before reuse. For severe exposures, get under safety shower, remove clothing under shower, get medical attention, and consult physician.

Inhalation:

Move to an area free from risk of further exposure. Administer oxygen or artificial respiration as needed. Obtain medical attention. Asthmatic-type symptoms may develop and be immediate or delayed up to several hours. Consult physician.

Ingested:

Do not induce vomiting. Give 12 fl. oz. of milk or water to drink. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Consult physician.

Recommendations to Physician:

Eyes: Stain for evidence of corneal injury. If cornea is burned, instill antibiotic steroid preparation frequently. Workplace vapors have produced reversible corneal epithelial edema impairing vision. This compound is a known skin sensitizer. Treat symptomatically as for contact dermatitis or thermal burns. There is no specific antidote for ingestion treat symptomatically. Inducing vomiting is contraindicated because of the irritating nature of this compound. TDI is a known pulmonary sensitizer. Treatment is essentially symptomatic. An individual having a skin or pulmonary sensitization reaction to this material should be removed from exposure to any isocyanate.

===== VI. REACTIVITY DATA =====

Stability: --XX--Stable -NA--Unstable

Conditions to Avoid: Temperatures higher than recommended in product literature.

Incompatibility (materials to avoid):

Water, short chain alcohols, amines

Hazardous Decomposition Products

By heat and fire: carbon dioxide, carbon monoxide, oxides of nitrogen and traces of hydrogen cyanide, TDI.

Hazardous Polymerization: NA-May Occur X-Will not occur

Conditions to avoid:

ND

===== VII. SPILL, LEAK AND DISPOSAL PROCEDURES =====

Steps to be taken if material is released or spilled:

Consult section VIII for proper protective equipment.

Cover the spill with sawdust, vermiculite, Fuller's earth or other absorbent material. Pour decontamination solution over the spill area and allow to react for at least 10 minutes. Collect the material in open top containers and add additional amounts of decontamination solution. Remove containers to a safe place, cover loosely, and allow to stand for 24 to 48 hours. Wash down spill area with decontamination solutions. Decontamination solutions: non-ionic surfactant Union Carbide's Tergitol TMN-10(20%) and water (80%); or concentrated ammonia (3-8%), detergent (2%), and water (90%). During spill clean-up, a self contained breathing apparatus or air line respirator and protective clothing must be worn. (See section VIII). Reportable Quantity CERCLA: 100lbs

Waste Disposal Method:

Dispose according to any Local, State and Federal Regulations.

===== VIII. SPECIAL HANDLING INFORMATION =====

Respiratory Protection:

A positive pressure air-supplied respirator is required whenever TDI concentrations exceed the Short-Term Exposure or Ceiling Limit of .02ppm or exceed the 8 hour Time Weighted Average TLV of 0.005 ppm. An air supplied respirator must also be worn during spray application, even if exhaust ventilation is used. For non-spray , short-term(less than 1 hour) situations where concentrations are near the TLV, a full face, air-purifying respirator equipped with organic cartridges or canisters can be used. However, TDI has poor warning properties since the odor at which TDI can be smelled is substantially higher than the 0.02 ppm. Therefore, proper fit and timely replacement of filter elements must be ensured. Observe OSHA regulations for respirator use. (29CFR 1910.134).

Ventilation:

Local exhaust should be used to maintain levels below the TLV whenever TDI containing material is handled, processed, or spray-applied. At normal room temperatures (70 F) TDI levels quickly exceed the TLV unless properly ventilated. Standard reference sources regarding industrial ventilation (e.g., ACGIH INDUSTRIAL VENTILATION) should be consulted for guidance about adequate ventilation.

Protective Gloves: Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water.

Eye Protection:

Liquid chemical goggles or full face shield

should be worn. Contact lenses should not be worn.

Other Protective Clothing or Equipment: Safety showers and eyewash stations should be available. Cover as much of exposed skin as possible with appropriate clothing.

Work Practices, hygienic practices
Educate and train employees in safe use of product. Follow
all label instructions.

===== IX SPECIAL PRECAUTIONS =====

Handling and Storage:

Store in tightly closed containers to prevent moisture
contamination. Do not reseal if contamination is suspect.

Other Precautions:

Avoid contact with eyes and skin. Do not breathe the
vapors.

===== X ADDITIONAL INFORMATION =====

SARA Title III Requirements:

TDI is on the Extremely Hazardous Substance.

Chemical Name	Section: 302	CERCLA	313

Toluene 2,4 Diisocyanate	TPQ-500 LBS	RQ-100 LBS	YES

T.S.C.A. Status: On Inventory

=====

Name(print): George C. Karpin !This formulation is subject
Signature: *George C. Karpin* !to change without notice.
Title: Toxicological Coordinator!In case of accident use the
Date of last revision 5/25/89!phone number provided.

To the best of our knowledge, the information contained
herein is accurate and meets all state and federal
guidelines. However, CONAP INC. does not assume any liability
whatsoever for the accuracy or completeness of the
information contained herein. All materials may present
unknown hazards and should be used with caution. Although
certain hazards are described herein, we cannot guarantee
that these are the only hazards which exist. Final
determination of the suitability of any material is the
sole responsibility of the user.

////////////////////////////////////
Date approved 5/25/89 Approved: *[Signature]*

ND=Not Determined

NA=Not Applicable

5/25/89 Approved: *[Signature]*

PART B PARTITION COEFFICIENTS

5.02 a. Specify the half-life of the listed substance in the following media.

<u>Media</u>	<u>Half-life (specify units)</u>
Groundwater	<u>UK</u>
Atmosphere	<u>UK</u>
Surface water	<u>UK</u>
Soil	<u>UK</u>

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

<u>CAS No.</u>	<u>Name</u>	<u>Half-life (specify units)</u>	<u>Media</u>
<u>UK</u>	<u>UK</u>	<u>UK</u>	in <u>UK</u>
			in
			in
			in

5.03 Specify the octanol-water partition coefficient, K_{ow} ... UK at 25°C
 Method of calculation or determination

5.04 Specify the soil-water partition coefficient, K_d UK at 25°C
 Soil type

5.05 Specify the organic carbon-water partition coefficient, K_{oc} UK at 25°C

5.06 Specify the Henry's Law Constant, H UK atm-m³/mole

☐ Mark (X) this box if you attach a continuation sheet.

5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

Bioconcentration Factor

Species

Test¹

UK

UK

UK

¹Use the following codes to designate the type of test:

F = Flowthrough

S = Static

☐ Mark (X) this box if you attach a continuation sheet.

6.04 For each market listed below, state the quantity sold and the total sales value of
CBI the listed substance sold or transferred in bulk during the reporting year.

☐

Not Applicable

Market	Quantity Sold or Transferred (kg/yr)	Total Sales Value (\$/yr)
--------	---	------------------------------

Market

Retail sales

Distribution -- Wholesalers

Distribution -- Retailers

Intra-company transfer

Repackagers

Mixture producers

Article producers

Other chemical manufacturers
or processors

Exporters

Other (specify)

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist
for the listed substance and state the cost of each substitute. A commercially
feasible substitute is one which is economically and technologically feasible to use
CBI in your current operation, and which results in a final product with comparable
performance in its end uses.

☐

Substitute

Cost (\$/kg)

UK

UK

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 7 MANUFACTURING AND PROCESSING INFORMATION

General Instructions:

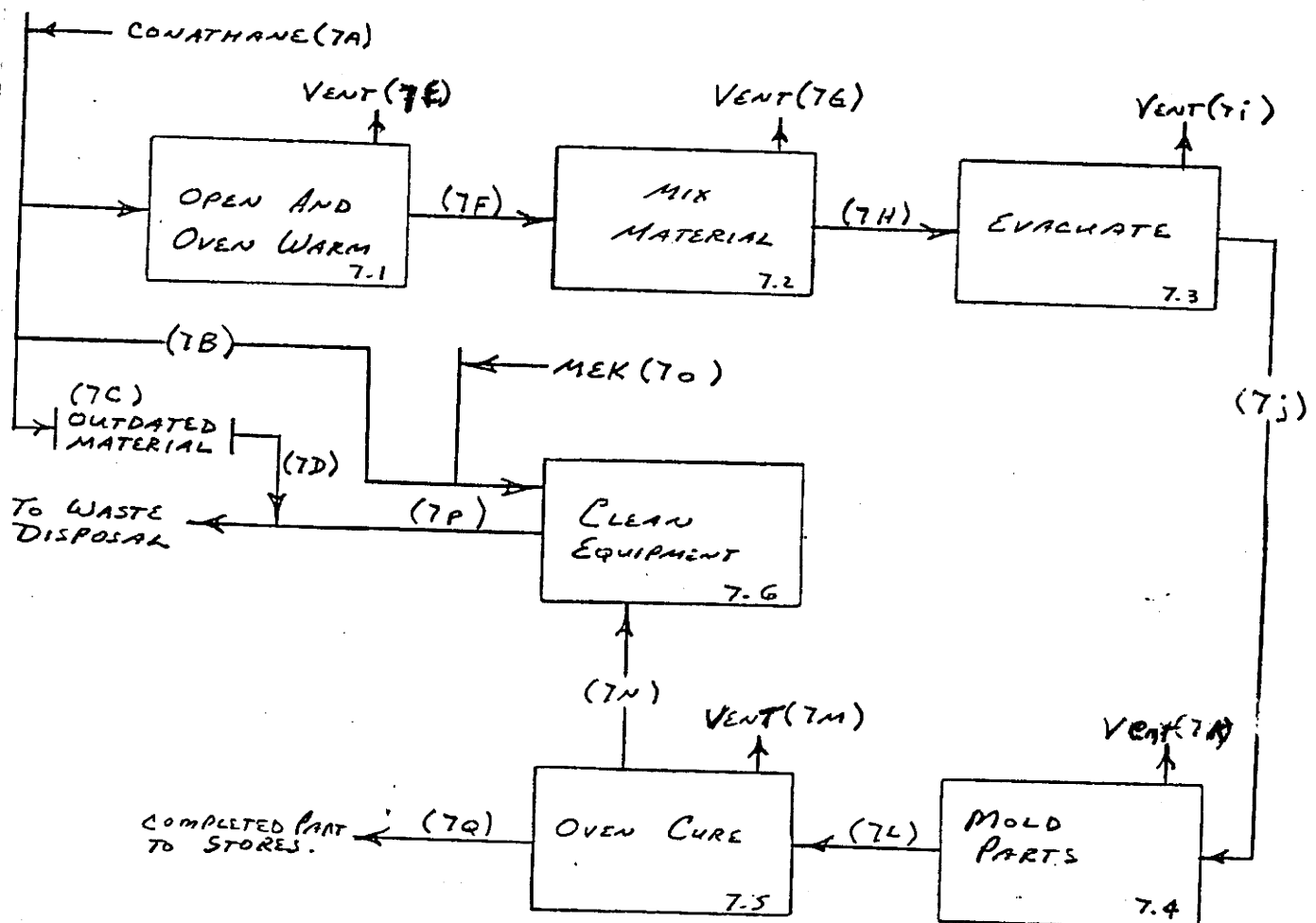
For questions 7.04-7.06, provide a separate response for each process block flow diagram provided in questions 7.01, 7.02, and 7.03. Identify the process type from which the information is extracted.

PART A MANUFACTURING AND PROCESSING PROCESS TYPE DESCRIPTION

7.01 In accordance with the instructions, provide a process block flow diagram showing major (greatest volume) process steps involving the listed substance

CBI

[] Process type MOLD POLYURETHANE PARTS



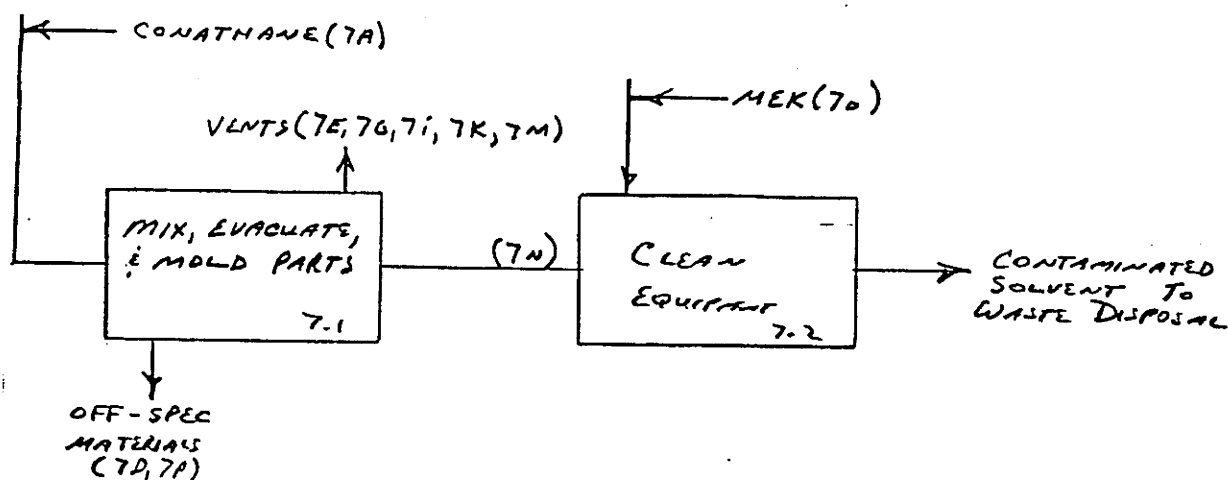
[] Mark (X) this box if you attach a continuation sheet.

CONATHANE-HUD3

7.03 In accordance with the instructions, provide a process block flow diagram showing process emission streams and emission points that contain the listed substance and which, if combined, would total at least 90 percent of all facility emissions if not treated before emission into the environment. If all such emissions are released from one process type, provide a process block flow diagram using the instructions for question 7.01. If all such emissions are released from more than one process type, provide a process block flow diagram showing each process type as a separate block.

CBI

☐ Process type MOLD POLYURETHANE PARTS



TDI Emissions

- 7E Warm Up - Oven Vent
- 7G Material Mix Station Vent
- 7I Evacuate Station Vent.
- 7K Parts Molding Vent
- 7M Curing Oven Vent

☐ Mark (X) this box if you attach a continuation sheet.

CONATHANE - HUB3

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Mold Polyurethane Parts

Unit Operation ID Number	Typical Equipment Type	Operating Temperature Range (°C)	Operating Pressure Range (mm Hg)	Vessel Composition
<u>7.1</u>	<u>Oven</u>	<u>66°</u>	<u>Atmospheric</u>	<u>Steel</u>
<u>7.2</u>	<u>Weighing Balance</u>	<u>Ambient</u>	<u>"</u>	<u>metal</u>
<u>7.2</u>	<u>1st Can</u>	<u>Ambient</u>	<u>"</u>	<u>NA</u>
<u>7.3</u>	<u>Bell Jar</u>	<u>Ambient</u>	<u>735 mm</u>	<u>Glass</u>
<u>7.4</u>	<u>Molding Syringe</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>Plastic</u>
<u>7.4</u>	<u>Molds</u>	<u>Ambient</u>	<u>"</u>	<u>NA</u>
<u>7.5</u>	<u>Oven</u>	<u>66°</u>	<u>"</u>	<u>Steel</u>
<u>7.6</u>	<u>Tray</u>	<u>Ambient</u>	<u>"</u>	<u>NA</u>
<u>7.6</u>	<u>Industrial Wipes</u>	<u>Ambient</u>	<u>"</u>	<u>Paper</u>

☐ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

BI

☐ Process type MOLD POLYURETHANE PARTS

Process Stream ID Code	Process Stream Description	Physical State ¹	Stream Flow (kg/yr)
<u>7E, 7G, 7i, 7K, 7M</u>	<u>HOODED ASSEMBLY BENCH</u>	<u>GU</u>	<u>UK</u>
<u>7D</u>	<u>OFF-SPEC CONATHANE</u>	<u>OL</u>	<u>UK</u>
<u>7P</u>	<u>MEK (80%) CONATHANE (20%)</u>	<u>OL</u>	<u>UK</u>
<u>7F, 7H, 7J, 7L</u>	<u>CONATHANE ERV-1554</u>	<u>OL</u>	<u>UK</u>

¹Use the following codes to designate the physical state for each process stream:

- GC = Gas (condensable at ambient temperature and pressure)
- GU = Gas (uncondensable at ambient temperature and pressure)
- SO = Solid
- SY = Sludge or slurry
- AL = Aqueous liquid
- OL = Organic liquid
- IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☐ Mark (X) this box if you attach a continuation sheet.

CONATHANE - HUD 3

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type Mold Polyurethane Parts

a.	b.	c.	d.	e.
Process Stream ID Code	Known Compounds ¹	Concentrations ^{2,3} (% or ppm)	Other Expected Compounds	Estimated Concentrations (% or ppm)
7E, 7H	TDI	NA	NA	UK
7J, 7L	"	"	"	"
7D, 7P	TDI	NA	NA	UK
7E, 7G	TDI	NA	NA	UK
7I, 7K, 7M	"	"	"	"

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.

Not

Applicable

¹For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
<u>1</u>		
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		

²Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

³Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 8 RESIDUAL TREATMENT GENERATION, CHARACTERIZATION, TRANSPORTATION, AND
MANAGEMENT

General Instructions:

For questions 8.04-8.06, provide a separate response for each residual treatment block flow diagram provided in question 8.01, 8.02 or 8.03. Identify the process type from which the information is extracted.

For questions 8.05-8.33, the Stream Identification Codes are those process streams listed in either the Section 7 or Section 8 block flow diagrams which contain residuals for each applicable waste management method.

For questions 8.07-8.33, if residuals are combined before they are handled, list those Stream Identification Codes on the same line.

Questions 8.09-8.33 refer to the waste management activities involving the residuals identified in either the Section 7 or Section 8 block flow diagrams. Not all Stream Identification Codes used in the sample answers (e.g., for the incinerator questions) have corresponding process streams identified in the block flow diagram(s). These Stream Identification codes are for illustrative purposes only.

For questions 8.11-8.33, if you have provided the information requested on one of the EPA Office of Solid Waste surveys listed below within the three years prior to your reporting year, you may submit a copy or reasonable facsimile in lieu of answering those questions which the survey addresses. The applicable surveys are: (1) Hazardous Waste Treatment, Storage, Disposal, and Recycling Survey; (2) Hazardous Waste Generator Survey; or (3) Subtitle D Industrial Facility Mail Survey.

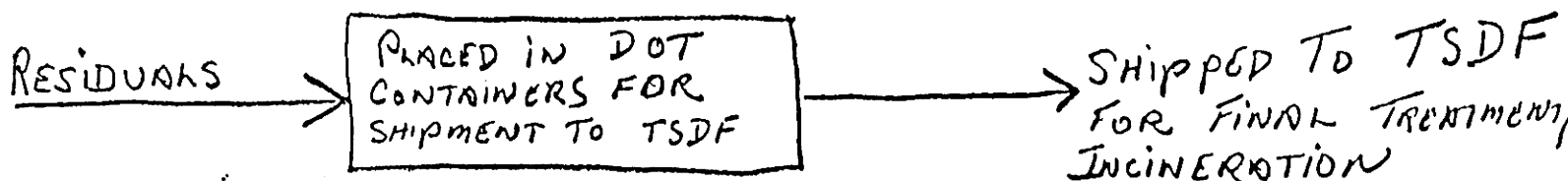
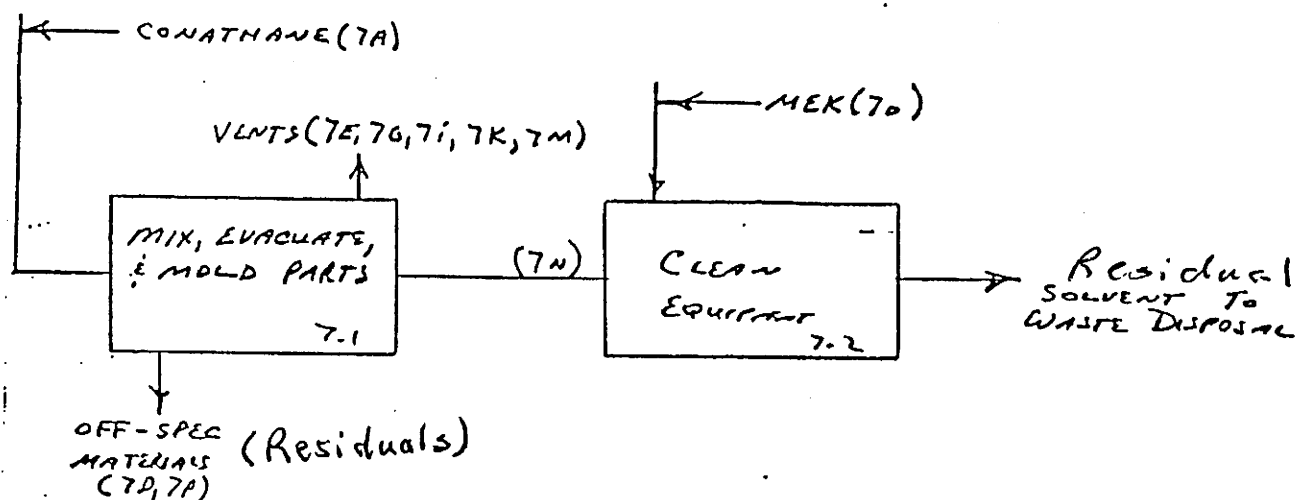
☐ Mark (X) this box if you attach a continuation sheet.

PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.0.

CBI

☐ Process type MOLD POLYURETHANE PARTS



ALL RESIDUALS ARE STORED UNTILL SHIPPED OFF SITE TO A BROKER WHO INTURN WILL SHIP THE MATERIAL FOR FINAL TREATMENT OR INCINERATION. NO ON SITE TREATMENT OR INCINERATION OCCURES.

☐ Mark (X) this box if you attach a continuation sheet.

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

a. b. c. d. e. f. g.

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

¹Use the following codes to designate the type of hazardous waste:

I = Ignitable
C = Corrosive
R = Reactive
E = EP toxic
T = Toxic
H = Acutely hazardous

²Use the following codes to designate the physical state of the residual:

GC = Gas (condensable at ambient temperature and pressure)
GU = Gas (uncondensable at ambient temperature and pressure)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

Not Applicable

³For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
<u>1</u>		
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		

⁴Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

Not Applicable

⁵Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

⁶Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

<u>Code</u>	<u>Method</u>	Detection Limit (\pm ug/l)
<u>1</u>		
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		
<u>6</u>		

☐ Mark (X) this box if you attach a continuation sheet.

8.06 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type

a.	b.	c.	d.	e.		f.	g.
Stream ID Code	Waste Description Code ¹	Management Method Code ²	Residual Quantities (kg/yr)	Management of Residual (%)		Costs for Off-Site Management (per kg)	Changes in Management Methods
On-Site	Off-Site						
7D	B70	11E	UK	0	100	UK	UK
7P	B76	11E	UK	0	100	UK	UK
7E, 7G 7F, 7K, 7M	B91	MS	UK	UK	NA	NA	NA

¹Use the codes provided in Exhibit 8-1 to designate the waste descriptions

²Use the codes provided in Exhibit 8-2 to designate the management methods

☐ Mark (X) this box if you attach a continuation sheet.

EXHIBIT 8-1.
(Refers to question 8.06(b))

WASTE DESCRIPTION CODES

These waste description codes were developed specifically for this survey to supplement the descriptions listed with the RCRA and other waste codes. (These waste description codes are not regulatory definitions.)

WASTE DESCRIPTION CODES FOR HAZARDOUS WASTE DESCRIBED BY A SINGLE RCRA F, K, P, OR U WASTE CODE

A01 Spent solvent (F001-F005, K086)	A06 Contaminated soil or cleanup residue	A10 Incinerator ash
A02 Other organic liquid (F001-F005, K086)	A07 Other F or K waste, exactly as described*	A11 Solidified treatment residue
A03 Still bottom (F001-F005, K086)	A08 Concentrated off-spec or discarded product	A12 Other treatment residue (specify in "Facility Notes")
A04 Other organic sludge (F001-F005, K086)	A09 Empty containers	A13 Other untreated waste (specify in "Facility Notes")
A05 Wastewater or aqueous mixture		

*"Exactly as described" means that the waste matches the description of the RCRA waste code.

INORGANIC LIQUIDS—Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content.

- 801 Aqueous waste with low solvents
- 802 Aqueous waste with low other toxic organics
- 803 Spent acid with metals
- 804 Spent acid without metals
- 805 Acidic aqueous waste
- 806 Caustic solution with metals but no cyanides
- 807 Caustic solution with metals and cyanides
- 808 Caustic solution with cyanides but no metals
- 809 Spent caustic
- 810 Caustic aqueous waste
- 811 Aqueous waste with reactive sulfides
- 812 Aqueous waste with other reactives (e.g., explosives)
- 813 Other aqueous waste with high dissolved solids
- 814 Other aqueous waste with low dissolved solids
- 815 Scrubber water
- 816 Leachate
- 817 Waste liquid mercury
- 818 Other inorganic liquid (specify in "Facility Notes")

INORGANIC SLUDGES—Waste that is primarily inorganic, with moderate-to-high water content and low organic content; pumpable.

- 819 Lime sludge without metals
- 820 Lime sludge with metals/metal hydroxide sludge
- 821 Wastewater treatment sludge with toxic organics
- 822 Other wastewater treatment sludge
- 823 Untreated plating sludge without cyanides
- 824 Untreated plating sludge with cyanides
- 825 Other sludge with cyanides
- 826 Sludge with reactive sulfides
- 827 Sludge with other reactives
- 828 Degreasing sludge with metal scale or filings
- 829 Air pollution control device sludge (e.g., fly ash, wet scrubber sludge)
- 830 Sediment or lagoon dragout contaminated with organics
- 831 Sediment or lagoon dragout contaminated with inorganics only

- 832 Drilling mud
- 833 Asbestos slurry or sludge
- 834 Chloride or other brine sludge
- 835 Other inorganic sludge (specify in "Facility Notes")

INORGANIC SOLIDS—Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; not pumpable.

- 836 Soil contaminated with organics
- 837 Soil contaminated with inorganics only
- 838 Ash, slag, or other residue from incineration of wastes
- 839 Other "dry" ash, slag, or thermal residue
- 840 "Dry" lime or metal hydroxide solids chemically "fixed"
- 841 "Dry" lime or metal hydroxide solids not "fixed"
- 842 Metal scale, filings, or scrap
- 843 Empty or crushed metal drums or containers
- 844 Batteries or battery parts, casings, cores
- 845 Spent solid filters or adsorbents
- 846 Asbestos solids and debris
- 847 Metal-cyanide salts/chemicals
- 848 Reactive cyanide salts/chemicals
- 849 Reactive sulfide salts/chemicals
- 850 Other reactive salts/chemicals
- 851 Other metal salts/chemicals
- 852 Other waste inorganic chemicals
- 853 Lab packs of old chemicals only
- 854 Lab packs of debris only
- 855 Mixed lab packs
- 856 Other inorganic solids (specify in "Facility Notes")

INORGANIC GASES—Waste that is primarily inorganic with a low organic content and is a gas at atmospheric pressure.

- 857 Inorganic gases

ORGANIC LIQUIDS—Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content.

- 858 Concentrated solvent-water solution
- 859 Halogenated (e.g., chlorinated) solvent
- 860 Nonhalogenated solvent

- 861 Halogenated/nonhalogenated solvent mixture
- 862 Oil-water emulsion or mixture
- 863 Waste oil
- 864 Concentrated aqueous solution of other organics
- 865 Concentrated phenolics
- 866 Organic paint, ink, lacquer, or varnish
- 867 Adhesives or epoxies
- 868 Paint thinner or petroleum distillates
- 869 Reactive or polymerizable organic liquid
- 870 Other organic liquid (specify in "Facility Notes")

ORGANIC SLUDGES—Waste that is primarily organic, with low-to-moderate inorganic solids content and water content; pumpable.

- 871 Still bottoms of halogenated (e.g., chlorinated) solvents or other organic liquids
- 872 Still bottoms of nonhalogenated solvents or other organic liquids
- 873 Oily sludge
- 874 Organic paint or ink sludge
- 875 Reactive or polymerizable organics
- 876 Resins, tars, or tarry sludge
- 877 Biological treatment sludge
- 878 Sewage or other untreated biological sludge
- 879 Other organic sludge (specify in "Facility Notes")

ORGANIC SOLIDS—Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; not pumpable.

- 880 Halogenated pesticide solid
- 881 Nonhalogenated pesticide solid
- 882 Solid resins or polymerized organics
- 883 Spent carbon
- 884 Reactive organic solid
- 885 Empty fiber or plastic containers
- 886 Lab packs of old chemicals only
- 887 Lab packs of debris only
- 888 Mixed lab packs
- 889 Other halogenated organic solid
- 890 Other nonhalogenated organic solid

ORGANIC GASES—Waste that is primarily organic with low-to-moderate inorganic content and is a gas at atmospheric pressure.

- 891 Organic gases

EXHIBIT 8-2.
(Refers to question 8.06(c))

MANAGEMENT METHODS

- M1 = Discharge to publicly owned
wastewater treatment works
M2 = Discharge to surface water under
NPDES
M3 = Discharge to off-site, privately
owned wastewater treatment works
M4 = Scrubber: a) caustic; b) water;
c) other
M5 = Vent to: a) atmosphere; b) flare;
c) other (specify) _____
M6 = Other (specify) _____

TREATMENT AND RECYCLING

Incineration/thermal treatment

- 1I Liquid injection
2I Rotary or rocking kiln
3I Rotary kiln with a liquid injection
unit
4I Two stage
5I Fixed hearth
6I Multiple hearth
7I Fluidized bed
8I Infrared
9I Fume/vapor
10I Pyrolytic destructor
11I Other incineration/thermal
treatment

Reuse as fuel

- 1RF Cement kiln
2RF Aggregate kiln
3RF Asphalt kiln
4RF Other kiln
5RF Blast furnace
6RF Sulfur recovery furnace
7RF Smelting, melting, or refining
furnace
8RF Coke oven
9RF Other industrial furnace
10RF Industrial boiler
11RF Utility boiler
12RF Process heater
13RF Other reuse as fuel unit

Fuel Blending

- 1FB Fuel blending

Solidification

- 1S Cement or cement/silicate processes
2S Pozzolanic processes
3S Asphaltic processes
4S Thermoplastic techniques
5S Organic polymer techniques
6S Jacketing (macro-encapsulation)
7S Other solidification

Recovery of solvents and liquid organics
for reuse

- 1SR Fractionation
2SR Batch still distillation
3SR Solvent extraction
4SR Thin-film evaporation
5SR Filtration
6SR Phase separation
7SR Dessication
8SR Other solvent recovery

Recovery of metals

- 1MR Activated carbon (for metals
recovery)
2MR Electrodialysis (for metals
recovery)
3MR Electrolytic metal recovery
4MR Ion exchange (for metals recovery)
5MR Reverse osmosis (for metals
recovery)
6MR Solvent extraction (for metals
recovery)
7MR Ultrafiltration (for metals
recovery)
8MR Other metals recovery

Wastewater Treatment

After each wastewater treatment type
listed below (1WT - 66WT) specify
a) tank; or b) surface impoundment
(i.e., 63WTa)

Equalization

- 1WT Equalization

Cyanide oxidation

- 2WT Alkaline chlorination
3WT Ozone
4WT Electrochemical
5WT Other cyanide oxidation

General oxidation (including
disinfection)

- 6WT Chlorination
7WT Ozonation
8WT UV radiation
9WT Other general oxidation

Chemical precipitation¹

- 10WT Lime
11WT Sodium hydroxide
12WT Soda ash
13WT Sulfide
14WT Other chemical precipitation

Chromium reduction

- 15WT Sodium bisulfite
16WT Sulfur dioxide

EXHIBIT 8-2. (continued)

MANAGEMENT METHODS

17WT Ferrous sulfate
18WT Other chromium reduction

Complexed metals treatment (other than
chemical precipitation by pH adjustment)
19WT Complexed metals treatment

Emulsion breaking
20WT Thermal
21WT Chemical
22WT Other emulsion breaking

Adsorption
23WT Carbon adsorption
24WT Ion exchange
25WT Resin adsorption
26WT Other adsorption

Stripping
27WT Air stripping
28WT Steam stripping
29WT Other stripping

Evaporation
30WT Thermal
31WT Solar
32WT Vapor recompression
33WT Other evaporation

Filtration
34WT Diatomaceous earth
35WT Sand
36WT Multimedia
37WT Other filtration

Sludge dewatering
38WT Gravity thickening
39WT Vacuum filtration
40WT Pressure filtration (belt, plate
and frame, or leaf)
41WT Centrifuge
42WT Other sludge dewatering

Air flotation
43WT Dissolved air flotation
44WT Partial aeration
45WT Air dispersion
46WT Other air flotation

Oil skimming
47WT Gravity separation

48WT Coalescing plate separation
49WT Other oil skimming

Other liquid phase separation
50WT Decanting
51WT Other liquid phase separation

Biological treatment
52WT Activated sludge
53WT Fixed film-trickling filter
54WT Fixed film-rotating contactor
55WT Lagoon or basin, aerated
56WT Lagoon, facultative
57WT Anaerobic
58WT Other biological treatment

Other wastewater treatment
59WT Wet air oxidation
60WT Neutralization
61WT Nitrification
62WT Denitrification
63WT Flocculation and/or coagulation
64WT Settling (clarification)
65WT Reverse osmosis
66WT Other wastewater treatment

OTHER WASTE TREATMENT

1TR Other treatment
2TR Other recovery for reuse

ACCUMULATION

1A Containers
2A Tanks

STORAGE

1ST Container (i.e., barrel, drum)
2ST Tank
3ST Waste pile
4ST Surface impoundment
5ST Other storage

DISPOSAL

1D Landfill
2D Land treatment
3D Surface impoundment (to be closed
as a landfill)
4D Underground injection well

¹Chemical precipitation is a treatment operation whereby the pH of a waste is adjusted to the range necessary for removal (precipitation) of contaminants. However, if the pH is adjusted solely to achieve a neutral pH, THE OPERATION SHOULD BE CONSIDERED NEUTRALIZATION (60WT).

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI ☐ Response not required for TDI

<u>Incinerator</u>	<u>Combustion Chamber Temperature (°C)</u>		<u>Location of Temperature Monitor</u>		<u>Residence Time In Combustion Chamber (seconds)</u>	
	<u>Primary</u>	<u>Secondary</u>	<u>Primary</u>	<u>Secondary</u>	<u>Primary</u>	<u>Secondary</u>
<u>1</u>	_____	_____	_____	_____	_____	_____
<u>2</u>	_____	_____	_____	_____	_____	_____
<u>3</u>	_____	_____	_____	_____	_____	_____

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI ☐ Not Applicable

<u>Incinerator</u>	<u>Air Pollution Control Device¹</u>	<u>Types of Emissions Data Available</u>
<u>1</u>	_____	_____
<u>2</u>	_____	_____
<u>3</u>	_____	_____

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

¹Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)

E = Electrostatic precipitator

O = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 9 WORKER EXPOSURE

General Instructions:

Questions 9.03-9.25 apply only to those processes and workers involved in manufacturing or processing the listed substance. Do not include workers involved in residual waste treatment unless they are involved in this treatment process on a regular basis (i.e., exclude maintenance workers, construction workers, etc.).

☐ Mark (X) this box if you attach a continuation sheet.

PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records on the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

☐

Data Element	Data are Maintained for:		Year in Which Data Collection Began	Number of Years Records Are Maintained
	Hourly Workers	Salaried Workers		
Date of hire	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Age at hire	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Work history of individual before employment at your facility	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Sex	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Race	<u>X</u>	<u>X</u>	<u>1961</u>	<u>Indef</u>
Job titles	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Start date for each job title	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
End date for each job title	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Work area industrial hygiene monitoring data	<u>X</u>	<u>X</u>	<u>1980</u>	<u>Indef</u>
Personal employee monitoring data	<u>X</u>	<u>X</u>	<u>1980</u>	<u>Indef</u>
Employee medical history	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Employee smoking history	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Accident history	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Retirement date	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Termination date	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Vital status of retirees	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>
Cause of death data	<u>X</u>	<u>X</u>	<u>1952</u>	<u>Indef</u>

☐ Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

a.	b.	c.	d.	e.
<u>Activity</u>	<u>Process Category</u>	<u>Yearly Quantity (kg)</u>	<u>Total Workers</u>	<u>Total Worker-Hours</u>
Manufacture of the listed substance	Enclosed	<u>Not App.</u>	<u>Not App.</u>	<u>Not App.</u>
	Controlled Release	<u>"</u>	<u>"</u>	<u>"</u>
	Open	<u>"</u>	<u>"</u>	<u>"</u>
On-site use as reactant	Enclosed	<u>"</u>	<u>"</u>	<u>"</u>
	Controlled Release	<u>"</u>	<u>"</u>	<u>"</u>
	Open	<u>"</u>	<u>"</u>	<u>"</u>
On-site use as nonreactant	Enclosed	<u>"</u>	<u>"</u>	<u>"</u>
	Controlled Release	<u>"</u>	<u>"</u>	<u>"</u>
	Open	<u>"</u>	<u>"</u>	<u>"</u>
On-site preparation of products	Enclosed	<u>"</u>	<u>"</u>	<u>"</u>
	Controlled Release	<u>"</u>	<u>"</u>	<u>"</u>
	Open	<u>104 kg</u>	<u>NA</u>	<u>NA</u>

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A

Mechanical Engineer

B

Chemical Material Technician

C

Jr. Chemical Material Technician

D

E

F

G

H

I

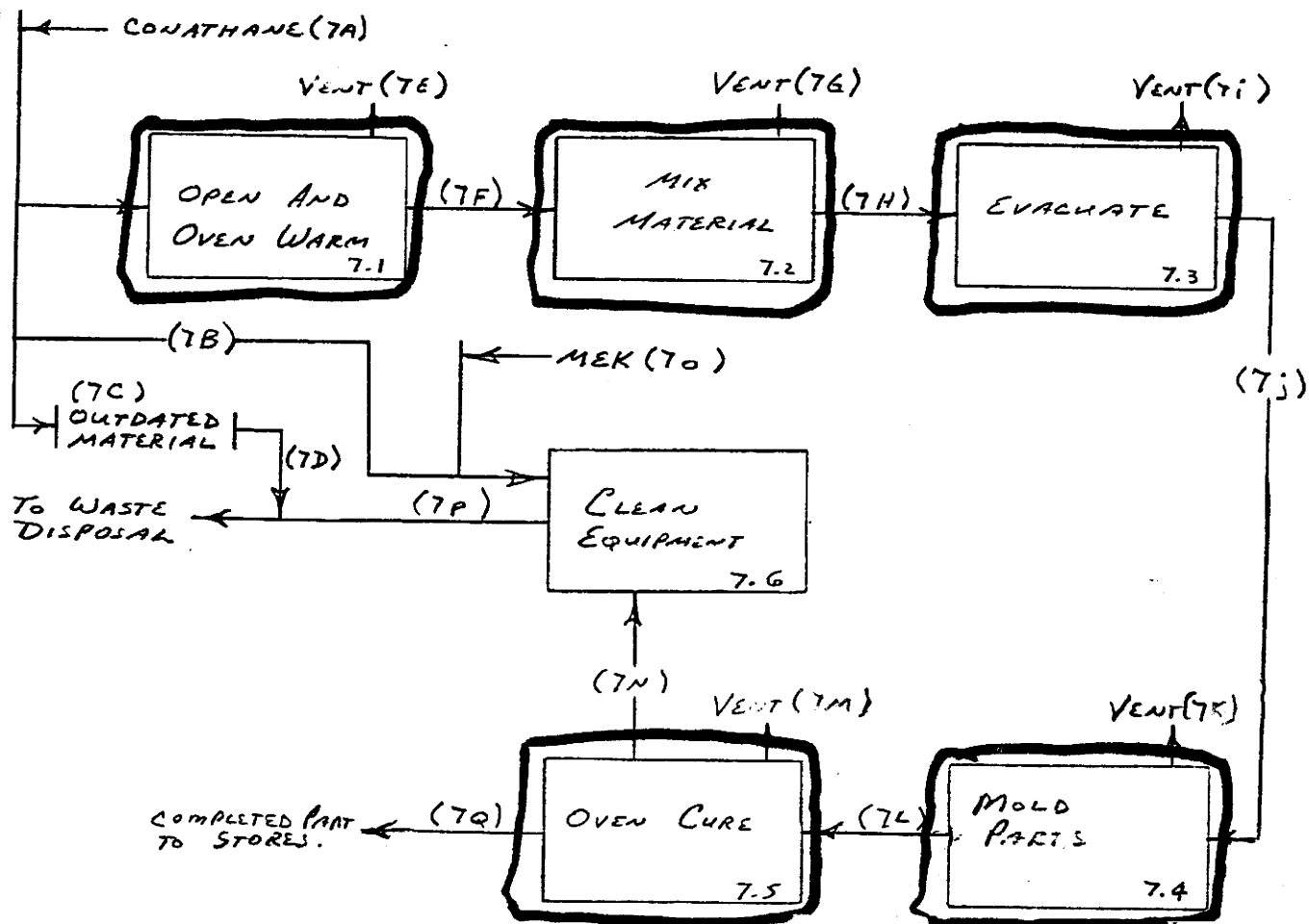
J

☐ Mark (X) this box if you attach a continuation sheet.

9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

CBI

[] Process type MOLD POLYURETHANE PARTS



[] Mark (X) this box if you attach a continuation sheet.

CONATHANE - HUD

- 9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. Add any additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Mold Polyurethane Parts

Work Area ID

Description of Work Areas and Worker Activities

- | | |
|---------|--|
| 1 (7.1) | <u>(7.1) Vented Oven - operator preheats</u> |
| 2 (7.2) | <u>material in oven for facilitates mixing</u> |
| 3 (7.3) | <u>(7.2) Ventilated Bench - operator mixes</u> |
| 4 (7.4) | <u>400 gm. batches of material.</u> |
| 5 (7.5) | <u>(7.3) Bell Jar - operator evacuates</u> |
| 6 | <u>material</u> |
| 7 | <u>(7.4) Ventilated Bench - operator fills</u> |
| 8 | <u>molding syringe and molds parts</u> |
| 9 | <u>(7.5) Ventilated Oven - operator cures</u> |
| 10 | <u>parts in oven for 16 hrs. @ 65°C.</u> |

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

☐ Process type Mold Polyurethane Parts

Work area Plastics Lab

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
<u>A</u>	<u>1</u>	<u>Inhalation</u>	<u>GU</u>	<u>A</u>	<u>35</u>
<u>B</u>	<u>1</u>	<u>Inhalation</u>	<u>OL</u>	<u>B</u>	<u>35</u>
<u>C</u>	<u>1</u>	<u>Inhalation</u>	<u>OL</u>	<u>A</u>	<u>35</u>
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)
 SO = Solid

SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less
 B = Greater than 15 minutes, but not exceeding 1 hour
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours
 E = Greater than 4 hours, but not exceeding 8 hours
 F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type Mold Polyurethane Parts

Work area Plastics Lab

Labor Category	8-hour TWA Exposure Level (ppm, mg/m ³ , other-specify)	15-Minute Peak Exposure Level (ppm, mg/m ³ , other-specify)
<u>A</u>	<u>NA</u>	<u>NA</u>
<u>B</u>	<u>NA</u>	<u>NA</u>
<u>C</u>	<u>NA</u>	<u>NA</u>

☐

Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

☐

<u>Sample/Test</u>	<u>Work Area ID</u>	<u>Testing Frequency (per year)</u>	<u>Number of Samples (per test)</u>	<u>Who Samples¹</u>	<u>Analyzed In-House (Y/N)</u>	<u>Number of Years Records Maintained</u>
Personal breathing zone	NA	NA	NA	A	N	Indef
General work area (air)	NA	NA	NA	A	N	Indef
Wipe samples	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Adhesive patches	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Blood samples	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Urine samples	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Respiratory samples	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Allergy tests	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Other (specify)						
	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Other (specify)	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}
Other (specify)	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}	NA _{pp}

¹Use the following codes to designate who takes the monitoring samples:

A = Plant industrial hygienist

B = Insurance carrier

C = OSHA consultant

D = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

9.09 For each sample type identified in question 9.08, describe the type of sampling and analytical methodology used for each type of sample.

☐ Sample Type Sampling and Analytical Methodology

NA	NA

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

CBI

<input type="checkbox"/> <u>Equipment Type</u> ¹	<u>Detection Limit</u> ²	<u>Manufacturer</u>	<u>Averaging Time (hr)</u>	<u>Model Number</u>
D	0.007A	Gilian	< 7 hr.	HFS 113A

¹Use the following codes to designate personal air monitoring equipment types:

A = Passive dosimeter

B = Detector tube

C = Charcoal filtration tube with pump

D = Other (specify) _____

NIOSH 141

Use the following codes to designate ambient air monitoring equipment types:

E = Stationary monitors located within work area

F = Stationary monitors located within facility

G = Stationary monitors located at plant boundary

H = Mobile monitoring equipment (specify) _____

I = Other (specify) _____

²Use the following codes to designate detection limit units:

A = ppm

B = Fibers/cubic centimeter (f/cc)

C = Micrograms/cubic meter (μm^3)

☐ Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

☐

Test Description

Frequency
(weekly, monthly, yearly, etc.)

Not Applicable

Not Applicable

☐ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Mold Polyurethane Parts

Work area Plastics Lab

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgrade</u>
Ventilation:				
Local exhaust	<u>Y</u>	<u>UK</u>	<u>UK</u>	<u>UK</u>
General dilution	<u>Not App.</u>	<u>Not App.</u>	<u>Not App.</u>	<u>Not App.</u>
Other (specify) _____	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Vessel emission controls	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Mechanical loading or packaging equipment	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Other (specify) _____	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>

☐ Mark (X) this box if you attach a continuation sheet.

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Mold Polyurethane Parts
 Work area Plastics Lab

Equipment or Process Modification	Reduction in Worker Exposure Per Year (%)
NA	NA

☐ Mark (X) this box if you attach a continuation sheet.

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

[] Process type Mold Polyurethane Parts
Work area plastics lab

<u>Equipment Types</u>	<u>Wear or Use (Y/N)</u>
Respirators	N
Safety goggles/glasses	Y
Face shields	N
Coveralls	N
Bib aprons	N
Chemical-resistant gloves	Y
Other (specify)	
<u>Lab Coat</u>	<u>Y</u>
	NA

☐ Mark (X) this box if you attach a continuation sheet.

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Not Applicable

<u>Work Area</u>	<u>Respirator Type</u>	<u>Average Usage¹</u>	<u>Fit Tested (Y/N)</u>	<u>Type of Fit Test²</u>	<u>Frequency of Fit Tests (per year)</u>
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

¹Use the following codes to designate average usage:

A = Daily
 B = Weekly
 C = Monthly
 D = Once a year
 E = Other (specify) _____

²Use the following codes to designate the type of fit test:

QL = Qualitative
 QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type Mold Polyurethane Parts
Work area Plastics Lab

All employees are trained in the use of chemicals as part of our compliance with OSHA 1910.1200.

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type Mold Polyurethane Parts
Work area Plastics Lab

<u>Housekeeping Tasks</u>	<u>Less Than Once Per Day</u>	<u>1-2 Times Per Day</u>	<u>3-4 Times Per Day</u>	<u>More Than 4 Times Per Day</u>
Sweeping	_____	<u>X</u>	_____	_____
Vacuuming	_____	_____	_____	_____
Water flushing of floors	<u>X</u>	_____	_____	_____
Other (specify)	_____	_____	_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure

Response Not Required for TDI

Yes

No

Emergency exposure

Yes

No

If yes, where are copies of the plan maintained?

Routine exposure: _____

Emergency exposure: _____

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

☒ Yes

No

If yes, where are copies of the plan maintained? *Environmental Affairs Office*

Has this plan been coordinated with state or local government response organizations? Circle the appropriate response.

Yes

☒ No

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

Response Not Required for TDI

Plant safety specialist

Insurance carrier

OSHA consultant

Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 10 ENVIRONMENTAL RELEASE

General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

PART A GENERAL INFORMATION

10.01 Where is your facility located? Circle all appropriate responses.

CBI

- ☐ Industrial area 1
- ☒ Urban area 2
- Residential area 3
- Agricultural area 4
- Rural area 5
- Adjacent to a park or a recreational area 6
- ☒ Within 1 mile of a navigable waterway 7
- ☒ Within 1 mile of a school, university, hospital, or nursing home facility 8
- (Presentation of Mary Academy)
- Within 1 mile of a non-navigable waterway 9
- Other (specify) _____ 10

☐ Mark (X) this box if you attach a continuation sheet.

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude 42° 44' 51

Longitude 71° 25' 30

UTM coordinates Zone _____, Northing _____, Easting _____

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitation UK inches/year

Predominant wind direction UK

10.04 Indicate the depth to groundwater below your facility.

Depth to groundwater UK meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of Y, N, and NA.)

CBI

☐

On-Site Activity	Environmental Release		
	Air	Water	Land
Manufacturing	<u>NA</u>	<u>NA</u>	<u>NA</u>
Importing	<u>NA</u>	<u>NA</u>	<u>NA</u>
Processing	<u>Y</u>	<u>N</u>	<u>N</u>
Otherwise used	<u>NA</u>	<u>NA</u>	<u>NA</u>
Product or residual storage	<u>NA</u>	<u>NA</u>	<u>NA</u>
Disposal	<u>NA</u>	<u>NA</u>	<u>NA</u>
Transport	<u>NA</u>	<u>NA</u>	<u>NA</u>

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐

Quantity discharged to the air UK kg/yr ± - %

Quantity discharged in wastewaters Not Applicable kg/yr ± - %

Quantity managed as other waste in on-site treatment, storage, or disposal units NA kg/yr ± - %

Quantity managed as other waste in off-site treatment, storage, or disposal units UK kg/yr ± - %

☐ Mark (X) this box if you attach a continuation sheet.

10.08 Describe the control technologies used to minimize release of the listed substance for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Mold Polyurethane Parts

<u>Stream ID Code</u>	<u>Control Technology</u>	<u>Percent Efficiency</u>
<u>7E</u>	<u>None</u>	<u>NA</u>
<u>7G</u>	<u>None</u>	<u>NA</u>
<u>7I</u>	<u>None</u>	<u>NA</u>
<u>7K</u>	<u>None</u>	<u>NA</u>
<u>7M</u>	<u>None</u>	<u>NA</u>

☐ Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

- 10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

Process type Molded Polyurethane Parts

Point Source
ID Code

Description of Emission Point Source

7E
7G
7I
7K
7m

Warming Oven Vent
Material Mix Station Vent
Evacuate Station Vent
Parts Molding Vent
Curing Oven Vent

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

10.10 Emission Characteristics - - Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

Point Source ID Code	Physical State ¹	Average Emissions (kg/day)	Frequency ² (days/yr)	Duration ³ (min/day)	Average Emission Factor ⁴	Maximum Emission Rate (kg/min)	Maximum Emission Rate Frequency (events/yr)	Maximum Emission Rate Duration (min/event)
7E	G	UK	UK	UK	UK	UK	UK	UK
7G	G	UK	UK	UK	UK	UK	UK	UK
7I	G	UK	UK	UK	UK	UK	UK	UK
7K	G	UK	UK	UK	UK	UK	UK	UK
7M	G	UK	UK	UK	UK	UK	UK	UK

¹Use the following codes to designate physical state at the point of release:
G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) _____

²Frequency of emission at any level of emission

³Duration of emission at any level of emission

⁴Average Emission Factor — Provide estimated (\pm 25 percent) emission factor (kg of emission per kg of production of listed substance)

10.11 Stack Parameters -- Identify the stack parameters for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

Point Source ID Code	Stack Height(m)	Stack Inner Diameter (at outlet) (m)	Exhaust Temperature (°C)	Emission Exit Velocity (m/sec)	Building Height(m) ¹	Building Width(m) ²	Vent Type ³
7E	2.9m	0.1m	UK	UK	7.3m	51.2m	H
7G	3.5m	0.2m	UK	UK	7.3m	51.2m	H
7I	3.5m	0.2m	UK	UK	7.3m	51.2m	H
7K	3.5m	0.2m	UK	UK	7.3m	51.2m	H
7M	2.9m	0.1m	UK	UK	7.3m	51.2m	H

¹ Height of attached or adjacent building

² Width of attached or adjacent building

³ Use the following codes to designate vent type:

H = Horizontal

V = Vertical

☐ Mark (X) this box if you attach a continuation sheet.

10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09. Photocopy this question and complete it separately for each emission point source.

CBI

☐

Point source ID code Not Applicable

Size Range (microns)

Mass Fraction (% ± % precision)

< 1

≥ 1 to < 10

≥ 10 to < 30

≥ 30 to < 50

≥ 50 to < 100

≥ 100 to < 500

≥ 500

Total = 100%

☐ Mark (X) this box if you attach a continuation sheet.

PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Not Applicable - Manual Molding Process
 Percentage of time per year that the listed substance is exposed to this process type %

Equipment Type	Number of Components in Service by Weight Percent of Listed Substance in Process Stream					Greater than 99%
	Less than 5%	5-10%	11-25%	26-75%	76-99%	
Pump seals ¹						
Packed						
Mechanical						
Double mechanical ²						
Compressor seals ¹						
Flanges						
Valves						
Gas ³						
Liquid						
Pressure relief devices ⁴ (Gas or vapor only)						
Sample connections						
Gas						
Liquid						
Open-ended lines ⁵ (e.g., purge, vent)						
Gas						
Liquid						

¹List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.

10.13 (continued)

²If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

³Conditions existing in the valve during normal operation

⁴Report all pressure relief devices in service, including those equipped with control devices

⁵Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

CBI

☐

Not Applicable

a. Number of Pressure Relief Devices	b. Percent Chemical in Vessel ¹	c. Control Device	d. Estimated Control Efficiency ²
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

¹Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

²The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

No + Applicable

☐ Process type

Equipment Type	Leak Detection	Detection Device ¹	Frequency of Leak Detection (per year)	Repairs Initiated (days after detection)	Repairs Completed (days after initiated)
	Concentration (ppm or mg/m ³) Measured at _____ Inches from Source				
Pump seals					
Packed	_____	_____	_____	_____	_____
Mechanical	_____	_____	_____	_____	_____
Double mechanical	_____	_____	_____	_____	_____
Compressor seals	_____	_____	_____	_____	_____
Flanges	_____	_____	_____	_____	_____
Valves					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Pressure relief devices (gas or vapor only)	_____	_____	_____	_____	_____
Sample connections					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Open-ended lines					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____

¹Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

- 10.16 Raw Material, Intermediate and Product Storage Emissions - - Complete the following table by providing the information on each liquid raw material, intermediate, and product storage vessel containing the listed substance as identified in your process block or residual treatment block flow diagram(s).

CBI

☐

Not Applicable

Vessel Type ¹	Floating Roof Seals ²	Composition of Stored Materials ³	Throughput (liters per year)	Vessel Filling Rate (gpm)	Vessel Filling Duration (min)	Vessel Inner Diameter (m)	Vessel Height (m)	Vessel Volume (l)	Vessel Emission Controls ⁴	Design Flow Rate ⁵	Vent Diameter (cm)	Control Efficiency (%)	Basis for Estimate ⁶

¹Use the following codes to designate vessel type:

F = Fixed roof
 CIF = Contact internal floating roof
 NCIF = Noncontact internal floating roof
 EFR = External floating roof
 P = Pressure vessel (indicate pressure rating)
 H = Horizontal
 U = Underground

²Use the following codes to designate floating roof seals:

MS1 = Mechanical shoe, primary
 MS2 = Shoe-mounted secondary
 MS2R = Rim-mounted, secondary
 LM1 = Liquid-mounted resilient filled seal, primary
 LM2 = Rim-mounted shield
 LMW = Weather shield
 VM1 = Vapor mounted resilient filled seal, primary
 VM2 = Rim-mounted secondary
 VMW = Weather shield

³Indicate weight percent of the listed substance. Include the total volatile organic content in parenthesis

⁴Other than floating roofs

⁵Gas/vapor flow rate the emission control device was designed to handle (specify flow rate units)

⁶Use the following codes to designate basis for estimate of control efficiency:

C = Calculations
 S = Sampling

PART E NON-ROUTINE RELEASES

No + Applicable

10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

<u>Release</u>	<u>Date Started</u>	<u>Time (am/pm)</u>	<u>Date Stopped</u>	<u>Time (am/pm)</u>
<u>1</u>	_____	_____	_____	_____
<u>2</u>	_____	_____	_____	_____
<u>3</u>	_____	_____	_____	_____
<u>4</u>	_____	_____	_____	_____
<u>5</u>	_____	_____	_____	_____
<u>6</u>	_____	_____	_____	_____

10.24 Specify the weather conditions at the time of each release.

Response not required for TDI

<u>Release</u>	<u>Wind Speed (km/hr)</u>	<u>Wind Direction</u>	<u>Humidity (%)</u>	<u>Temperature (°C)</u>	<u>Precipitation (Y/N)</u>
<u>1</u>	_____	_____	_____	_____	_____
<u>2</u>	_____	_____	_____	_____	_____
<u>3</u>	_____	_____	_____	_____	_____
<u>4</u>	_____	_____	_____	_____	_____
<u>5</u>	_____	_____	_____	_____	_____
<u>6</u>	_____	_____	_____	_____	_____

☐ Mark (X) this box if you attach a continuation sheet.